

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
WINSTON-SALEM DIVISION**

In re:	)	Chapter 11
	)	
Product Quest Manufacturing, LLC, <i>et al.</i> , <sup>1</sup>	)	Case No. 18-50946
	)	(Joint Administration Pending)
	)	
Debtors.	)	
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**DEBTORS' MOTION FOR AN ORDER TO EXTEND TIME TO  
FILE SCHEDULES AND STATEMENTS OF FINANCIAL AFFAIRS**

Ei LLC (EI), Product Quest Manufacturing, LLC (PQM), Scherer Labs International, LLC (Scherer), Product Quest Logistics, LLC (PQL), JBTRS, L.L.C. (JBTRS), and PQ Real Estate LLC (PQ Real Estate), together with EI, PQM, Scherer, PQL, and JBTRS, collectively, the "Debtors") file this *Motion for an Order to Extend Time to File Schedules and Statements of Financial Affairs* (the "Motion"). In support of this Motion, the Debtors respectfully represent as follows:

**JURISDICTION AND VENUE**

1. This Court has jurisdiction over these cases and this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Ei LLC (6099); (ii) Product Quest Manufacturing, LLC (4401); (iii) Scherer Labs International, LLC (5258); (iv) Product Quest Logistics, LLC (6199); (v) JBTRS, L.L.C. (1249); and (vi) PQ Real Estate LLC (4569). The Debtors' service address is: 2865 N. Cannon Blvd., Kannapolis, North Carolina 28083.

2. The statutory predicates for the relief requested herein are section 521 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), and Rule 1007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

### **BACKGROUND**

3. On the date hereof (the “Petition Date”), each of the Debtors filed a voluntary petition with the Court under chapter 11 of the Bankruptcy Code.

4. On the Petition Date, each Debtor filed a substantially similar motion with this Court seeking to have its bankruptcy case jointly administered with the other Debtors’ cases pursuant to Bankruptcy Rule 1015(b).

5. The factual background relating to the Debtors’ commencement of these cases is set forth in detail in the *Declaration of Michael J. Musso in Support of First Day Motions and Applications* filed on the Petition Date and incorporated herein by reference.

6. The Debtors have continued in possession of their properties and have continued to manage their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

7. As of the date of this filing, no official committee of unsecured creditors has been appointed in any of these cases, and no request has been made for the appointment of a trustee or examiner.

### **RELIEF REQUESTED**

8. By this Motion, the Debtors request the entry of an order, pursuant to Bankruptcy Code section 521 and Bankruptcy Rule 1007(c), extending the time to file their schedules and statements of financial affairs (collectively, the “Schedules”) until October 7, 2018.

9. To prepare the Schedules, the Debtors must gather information from books, records, and documents relating to a multitude of transactions. Consequently, collection of the necessary information requires the expenditure of substantial time and effort on the part of the Debtors' limited and already over-burdened employees. The Debtors submit that the efforts of their employees during the initial stages of these cases are critical and need to be focused on attending to the Debtors' business and maximizing the value of the Debtors' estates. The Debtors' employees will begin working diligently to assemble and collate the necessary information. The Debtors anticipate that they will need a minimum of 30 days in order to prepare and file their Schedules in the appropriate format.

10. For these reasons, the Debtors believe that they will be unable to compile all the information necessary for the preparation and filing of the Schedules within fourteen days after the entry of the order for relief, as required by Bankruptcy Rule 1007(c).

#### **BASIS FOR RELIEF**

11. Bankruptcy Rule 1007(c) permits extensions, for cause, of the time for filing schedules and statements. The Debtors submit that in view of their limited resources and the amount and type of information that must be assembled and compiled, ample cause exists for the requested extension.

12. Moreover, the relief requested in this Motion will not prejudice any party-in-interest. As required by Bankruptcy Code section 521(a) and Bankruptcy Rule 1007(a)(1) and (d), the Debtors have, or will have, filed (i) a list setting forth the names and addresses of all of their creditors, and (ii) a list setting forth the names, addresses, and claim amounts of creditors holding the thirty (30) largest unsecured claims on a consolidated basis.

**NOTICE**

13. Notice of this Motion has been provided to the Office of the U.S. Bankruptcy Administrator, counsel for the Debtors' pre-petition secured lenders, Bank of America, N.A., the Internal Revenue Service, and the Debtors' thirty (30) largest unsecured creditors on a consolidated basis. In light of the nature of the relief requested, the Debtors submit that no further notice is necessary.

**CONCLUSION**

WHEREFORE, the Debtors respectfully request that this Court:

- (a) enter an order in the form attached hereto as Exhibit A granting the relief requested herein; and
- (b) grant the Debtors such other and further relief as is just and proper.

*[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]*

Dated: September 7, 2018

Respectfully submitted,

NORTHEN BLUE LLP

/s/ John A. Northen

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PROPOSED COUNSEL FOR THE  
DEBTORS-IN-POSSESSION

**EXHIBIT A**

**Proposed Order**

**THE UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
WINSTON-SALEM DIVISION**

<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>Product Quest Manufacturing, LLC, <i>et al.</i>,<sup>1</sup></b>	)	<b>Case No. 18-50946</b>
	)	<b>(Joint Administration Pending)</b>
	)	
<b>Debtors.</b>	)	
	)	

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**ORDER GRANTING MOTION TO EXTEND TIME TO FILE SCHEDULES  
AND STATEMENTS OF FINANCIAL AFFAIRS**

This matter is before the Court on the *Ex Parte Motion for an Order to Extend Time to File Schedules and Statements of Financial Affairs* (the “Motion”) of Ei LLC (“EI”), Product Quest Manufacturing, LLC (“PQM”), Scherer Labs International, LLC (“Scherer”), Product Quest Logistics, LLC (“PQL”), JBTRS, L.L.C. (“JBTRS”), and PQ Real Estate LLC (“PQ Real Estate”), together with EI, PQM, Scherer, PQL, and JBTRS, collectively, the “Debtors”). All

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: (i) Ei LLC (6099); (ii) Product Quest Manufacturing, LLC (4401); (iii) Scherer Labs International, LLC (5258); (iv) Product Quest Logistics, LLC (6199); (v) JBTRS, L.L.C. (1249); and (vi) PQ Real Estate LLC (4569). The Debtors’ service address is: 2865 N. Cannon Blvd., Kannapolis, North Carolina 28083.

capitalized terms used but not defined herein shall have the meanings given to them in the Motion.

The Court has considered the Motion, the *Declaration of Michael J. Musso in Support of First Day Motions and Applications*, and the matters reflected in the record of the hearing held on the Motion on September \_\_\_\_, 2018. It appears that the Court has jurisdiction over this proceeding; that this is a core proceeding; that notice of the Motion has been given to the Office of the U.S. Bankruptcy Administrator, counsel for the Debtors' pre-petition secured lenders, Bank of America, N.A., the Internal Revenue Service, and the Debtors' thirty (30) largest unsecured creditors on a consolidated basis; that no further notice is necessary; that the relief sought in the Motion is in the best interests of the Debtors, their estates, and their creditors; and that good and sufficient cause exists for such relief.

Accordingly, it is hereby ORDERED as follows:

1. The Motion is GRANTED.
2. The time within which the Debtors are required to file the Schedules is extended until October 7, 2018.
3. Entry of this Order is without prejudice to the right of the Debtors to seek a further extension of time to file their Schedules.
4. Counsel to the Debtors is directed to serve a copy of this Order on all parties on the Master Service List within three (3) days of the entry of this Order and to file a certificate of service with the Clerk of the Court.

[END OF DOCUMENT]